

STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION

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April 5, 2024

**RE: In the Matter of Minnesota Power's 2023 Transportation Electrification Plan
Docket No. E002/M-23-258**

Initial Comments of Fresh Energy, Union of Concerned Scientists, Sierra Club, and Plug In America

Fresh Energy, Union of Concerned Scientists, Sierra Club and Plug In America (the Clean Energy Groups, or CEGs) submit these Initial Comments in response to the Commission's November 15, 2023 [Notice of Comment Period](#) and January 19, 2024 [Notice of Extended Comment Period](#) on Minnesota Power's 2023 Integrated Distribution Plan, focusing in on Appendix E - Minnesota Power's Transportation Electrification Plan (TEP). We appreciate the opportunity to participate in this docket.

The CEGs recommend the Commission accept Minnesota Power's 2023 Transportation Electrification Plan (TEP) with requirements for subsequent filings to fill in gaps in the plan. The CEGs' recommendations for subsequent filings include:

- Additional discussion of how Minnesota Power is preparing for and supporting adoption of more medium- and heavy-duty electric vehicles (EVs), particularly transit buses, school buses, and trucks;
- A robust discussion of equity, including analysis on how Minnesota Power's EV programs are serving those disproportionately impacted by transportation pollution, as well as renters, multifamily housing residents, communities of color, "low to moderate" income customers, and rural communities; and what gaps may remain;
- Discussion of coordination between EVs, energy efficiency, and building electrification planning, including, for example, Energy Conservation & Optimization (ECO) programs.

We also request Minnesota Power to propose an additional EV residential managed charging program by or before their next TEP filing.

Finally, the CEGs request Minnesota Power provide responses to the following questions:

- (1) How many of its customers on the Residential Time-of-Day rate have an EV, and what feedback (if any) has the Company received from customers on why EV drivers have or have not adopted the whole-home TOD rate?
- (2) How many medium- and heavy-duty electric vehicles domicile in Minnesota Power's service territory?
- (3) Are there any alternative technology providers that exist in the market that could replace the original technology provider selected for the canceled Charging Rewards Pilot?

1) Introduction

Planning for transportation electrification continues to increase in importance. Effective utility programs are necessary to both increase adoption of electric vehicles (EVs) – which will reduce Minnesota's greenhouse gas (GHG) emissions, improve public health, and reduce household expenses – and to ensure that new EV charging loads are integrated efficiently into the grid in a manner that facilitates integration of increased use of renewable energy.

a. Greenhouse Gas Reductions

Numerous independent studies spanning well over a decade have come to the same conclusion: reducing global warming pollution to the levels required to avoid the worst impacts of climate change will require a dramatic shift to EVs powered by renewable and other zero-carbon energy sources.¹ EVs are cleaner than gasoline and diesel vehicles today and will

¹ See, e.g., Pinto de Moura, Maria Cecilia, 2022, *Low Carbon Pathway for Transportation: Ramping up vehicle electrification and phasing out petroleum*, Union of Concerned Scientists, <https://www.ucsusa.org/resources/low-carbon-pathways-transportation>; Williams, J.H. et al., "Pathways to Deep Decarbonization in the United States," Energy and Environmental Economics, Inc. (E3), November 2014; Williams, J.H. et al., "The Technology Path to Deep Greenhouse Gas Emissions Cuts by 2050: The Pivotal Role of Electricity," *Science* 335, no. 6064 (January 2012): 53-59; Melaina, M. and K. Webster, "Role of Fuel Carbon Intensity in Achieving 2050 Greenhouse Gas Reductions within the Light-Duty Vehicle Sector," *Environ. Sci. Technol.* 45, no. 9 (2011): 3865–3871; International Energy Agency, "Transport, Energy, and CO2: Moving Towards Sustainability," OECD/IEA, 2009; National Research Council, "Transitions to Alternative Vehicles and Fuels," (Washington, D.C.: The National Academies Press, 2013).

become even more so as the electricity generation mix used to charge the vehicles continues its transition from fossil fuel sources to renewable energy.²

A report by research firm MJ Bradley & Associates (now ERM) found a mass market for light-duty EVs consistent with meeting the state's long-term greenhouse gas reduction goals would reduce annual greenhouse gas emissions in Minnesota by over 17 million tons per year for light-duty vehicles alone, leading to \$10.4 billion cumulative net benefits from greenhouse gas reductions by 2050.³

b. Public Health

In addition to reducing greenhouse gas emissions and the associated climate impacts, electrifying transportation would have tremendous public health benefits from reducing local air pollution. In their 2022 "Life and Breath Report: Great Minnesota," the Minnesota Department of Health and Pollution Control Agency found adverse health impacts from fine particles and ozone pollution in several cities in Greater Minnesota, including Duluth, located in Minnesota Power's service territory.⁴ The report also found that communities in these cities with higher percentages of "low-income residents, Black, Indigenous or People of Color residents, uninsured residents, or residents living with a disability have the highest estimated air pollution-related death and disease rates," and estimated that air pollution contributed to 62 early deaths in Duluth in 2025.⁵

Swapping EVs for gas and diesel vehicles helps alleviate some of this air pollution, particularly in the more densely populated urban areas where they are most harmful. MJ Bradley & Associates estimate that EV adoption consistent with meeting the state's long-term greenhouse gas reduction goals could provide cumulative \$700 million in health and other societal cumulative net benefits from emission of nitrogen oxides (NOx, a precursor to smog and fine particulate matter pollutant⁶) by 2050.⁷

² Reichmuth, David, March 2023, "Today's Electric Vehicles Can Greatly Reduce Emissions From Driving", Union of Concerned Scientist, *The Equation*, <https://blog.ucsusa.org/dave-reichmuth/todays-electric-vehicles-can-greatly-reduce-emissions-from-driving/>

³ M.J. Bradley & Associates, July 2018, "Plug-in Electric Vehicle Cost-Benefit Analysis: Minnesota," <https://www.erm.com/globalassets/documents/mjba-archive/reports/2018/mn-pev-cb-analysis-final-15aug18.pdf> (hereinafter MJB&A Analysis)

⁴ Minnesota Department of Health and Minnesota Pollution Control Agency, 2022, *Life and Breath: Greater Minnesota*, <https://data.web.health.state.mn.us/web/mndata/life-and-breath-greater-minnesota-2022>.

⁵ *Id.* at Table 1

⁶ O'Dea, Jimmy. "Ready for Work" (2019). Union of Concerned Scientists. At page 2. Available at <https://www.ucsusa.org/sites/default/files/2019-12/ReadyforWorkFullReport.pdf> (accessed April 2, 2024)

⁷ MJB&A Analysis

c. Grid Services

EVs have great potential to enhance the efficient use of grid resources and provide grid services, including support for the incorporation of renewable energy, through both smart charging and, in some cases, power export. Grid efficiency and services from EVs will lead to benefits for all utility customers, and successful implementation of utility EV programs and rate options can both accelerate transportation electrification and enhance the benefits those EVs can offer. According to the MJ Bradley & Associates analysis, the deployment of EVs consistent with the state's long-term goals could lead to \$10.2 billion in reduced electric bills for customers by 2050.⁸

In total, the MJ Bradley & Associates analysis finds that light-duty EVs adoption consistent with meeting the state's long-term greenhouse gas reduction goals could provide cumulative net benefits of over \$30 billion to the state of Minnesota by 2050, with greenhouse gas reduction, NOx reductions, customer bill savings, and EV driver operating cost savings taken together.⁹

d. Minnesota Policy Landscape

Capitalizing on the tremendous emissions reduction potential of EVs is especially important in light of Minnesota's strong greenhouse gas reductions goals. The state's Greenhouse Gas Emissions-Reduction Goal, which was updated in 2023 states: "It is the goal of the state to reduce statewide greenhouse gas emissions across all sectors producing those emissions to a level at least 15 percent below 2005 levels by 2015, to a level at least 50 percent below 2005 levels by 2030, and to net zero by 2050."¹⁰ Within the transportation sector, Minnesota's Climate Action Framework sets the goal of reducing emissions by 80 percent by 2040 and the goal of having 20% of vehicles on Minnesota roads be electric vehicles.¹¹

As of 2020, the state had achieved a 23 percent reduction in emissions since 2005.¹² That improvement could put the state on a path to meeting its emissions reduction goals in 2025 and beyond. However, the 2020 data were anomalously low due to the COVID-19 pandemic. Many energy uses have rebounded since pandemic restrictions lifted, and 2021 data on GHG

⁸ *Id.*

⁹ *Id.*

¹⁰ Minn. Stat. §216H.02, subd. 1.

¹¹ "Climate Action Framework." *Our Minnesota Climate*, <https://climate.state.mn.us/minnesotas-climate-action-framework>.

¹² Minnesota Pollution Control Agency and Minnesota Department of Commerce, January 2023, "Greenhouse Gas Emissions in Minnesota 2005-2020", <https://www.pca.state.mn.us/sites/default/files/Iraq-2sy23.pdf>

emissions from the Environmental Protection Agency confirm that Minnesota transportation emissions increased by 2.2 million metric tons of CO₂ equivalents between 2020 and 2021.¹³ Accordingly, the state must continue concerted efforts to reduce emissions across the economy and for transportation, the largest source of emissions.¹⁴

The Minnesota Climate Action Framework also identifies the need for the State to have a comprehensive Electric Vehicle Plan and highlights the development of said plan as a priority action for the administration.

In the 2023 legislation session, Minnesota statute was modified to require that investor-owned utilities without pending related filings submit transportation and electrification plans by November 1, 2023, and periodically as ordered by the commission but at least every four years thereafter.¹⁵ The updated statute also dictates the criteria the commission must consider when deciding whether to approve, modify, or reject a transportation plan, which include whether programs, investments, and expenditures are in the public interest and are reasonably expected to: reduce emissions and air pollutants; improve operation of the grid; increase access to electricity as a transportation fuel for all customers; increase access to public chargers; support electrification of medium- and heavy-duty vehicles; stimulate job growth; educate the public about the benefits of EVs; provide transparent public reporting of program activities; balance the benefits of transportation electrification with the impacts on utility rates; and balance public and private participation in transportation electrification market.¹⁶

e. Federal Policy Landscape

In March 2024, the U.S. Environmental Protection Agency finalized new, protective emissions standards for new passenger cars and light trucks and for new heavy-duty vehicles, with both standards to take effect beginning with model year 2027.

The passenger vehicle standards require emissions reductions across each automaker's fleet of vehicles, which automakers can achieve by implementing cleaner technologies for gasoline engines or by adding more zero-emission vehicles to their offerings. The heavy-duty standards

¹³ U.S. Environmental Protection Agency, Greenhouse Gas Inventory Data Explorer, <https://cfpub.epa.gov/ghgdata/inventoryexplorer/#allsectors/allsectors/allgas/econsect/all>

¹⁴ Minnesota Pollution Control Agency and Minnesota Department of Commerce, January 2023, "Greenhouse Gas Emissions in Minnesota 2005-2020", <https://www.pca.state.mn.us/sites/default/files/Iraq-2sy23.pdf>, at 5.

¹⁵ Minn. Stat. §216B.1615, subd. 2.

¹⁶ *Id.*

specifically require reduced greenhouse gas emissions from vocational trucks including transit buses, school buses, delivery trucks, and garbage trucks.¹⁷

Both of these rules, along with the historic investments in electric vehicles from the 2021 Infrastructure, Investment, and Jobs Act and 2022 Inflation Reduction Act, are paving an even clearer road for on-road transportation electrification in the coming years, which makes TEPs an even more important planning tool for Minnesota’s largest utilities.

2) Current and Proposed Program Offerings

As active participants on utility electric EV policy issues before this Commission since 2017, the Clean Energy Groups have advocated for utilities to accelerate EV adoption in a manner that is as equitable and accessible as possible. This role encompasses providing incentives for customers to charge at times most beneficial to the electric grid (“managed charging”); investing in both electric vehicle supply infrastructure (EVSII) and electric vehicle supply equipment (EVSE); and create programs that enable all customers -- whether under-resourced, renters, multifamily housing residents, or commercial – to access affordable EV charging options.

This Transportation Electrification Plan (“TEP” or “Plan”) marks the beginning of a new process for parties to review a utilities’ entire portfolio of EV proposals alongside general discussion of where the utility plans to head with its EV programming, and as part of the broader discussion on how utilities are incorporating EV planning into its distribution planning. Below, the Clean Energy Groups review Minnesota Power’s proposals and identify additional areas or “gaps” for the Company to address in subsequent filings.

a. EV Residential Offerings

Minnesota Power estimates there are about 500 light-duty EVs in its service territory.¹⁸ Of those, about 27 are enrolled in its Off-Peak Residential Electric Vehicle rate, which requires installation of a separately metered, second service. Minnesota Power notes that it has heard feedback from customers that requiring a second metered service is a barrier.¹⁹ Minnesota Power points to its whole-home Residential Time-of-Day (TOD) rate as an alternative to

¹⁷ Davide Cooke, UCS, [“EPA’s Final 2027-2032 Truck Rule Risks Leaving Communities Behind.”](#) Published March 29, 2024.

¹⁸ Minnesota Power, 2023 Integrated Distribution Plan, at 28 (hereby “MP IDP”).

¹⁹ Appendix E - Transportation Electrification Plan of MP IDP, at 10 (hereby “MP TEP”)

installing a second meter, as EV customers can still access overnight off-peak charging at lower electricity rates.²⁰ However, Minnesota Power does not share how many of its customers enrolled in its whole-home Residential Time-of-Day rate have an EV. In addition, it is not clear to us whether the whole-home TOD rate is attractive, relative to the standard residential rate, to EV drivers in terms of the net bill impact, given the household may have inflexible loads on the premises. **The CEGs ask Minnesota Power to share how many customers on its Residential Time-of-Day rate also have an EV as well as any feedback it has received from customers on why EV drivers have or have not adopted the whole-home TOD rate, in its reply comments.**

Minnesota Power also offers two rebates meant to overcome the cost barrier for residential customers looking to access off-peak charging for their EV. The first rebate is \$500 towards installing a second service to participate in the Off-Peak Residential Electric Vehicle rate. Seven such rebates were provided between May 1, 2022 to April 30, 2023. The second rebate is \$500 towards a Level 2 Smart Charger. A customer must be enrolled in a time-of-use rate or program to qualify for this rebate. Eighteen rebates were provided between May 1, 2022 and April 30, 2023.²¹

Minnesota Power also notes that a pre-planned and previously approved Charging Rewards Pilot was canceled due to the original technology provider being acquired and subsequently ending its original offering.²² While Minnesota Power notes that its EV program offerings will adapt and evolve over time, it does not at this point provide a timeline for developing a future EV residential rate program.²³

While Minnesota Power has a relatively small amount of EVs in its service territories compared to Xcel Energy, 500 EVs is still a clear showing that Minnesota Power customers are interested in and buying EVs. However, of these 500²⁴ light-duty EVs, only 27 (at minimum) are on a managed charging program. In other words, only 5.4% of Minnesota Power's relatively few EV customers are currently *actively incentivized* to charge off-peak at a time beneficial to both them and to the electric grid.

The CEGs are concerned that enrollment in programs that incentivize managed charging is lagging so far behind EV adoption and that not enough planning is underway to address the issue. It is essential to develop a portfolio of residential managed charging programs that

²⁰ Ibid.

²¹ *Id.* at 10-11

²² MP IDP at 29

²³ MP TEP at 9 - Figure 2 doesn't show any additional EV residential offerings anticipated between 2023 - 2025.

²⁴ MP IDP at 28, footnote 13 notes this is an estimate as of October 2021, indicating it is likely an undercount of current light-duty EVs in its service territory.

appeal to a variety of drivers and to effectively educate and recruit drivers to those programs now, before increased and more rapid adoption of EVs take place in Minnesota Power's territory. This concern is exacerbated by the fact that Minnesota Power's previously planned residential EV charging offering, the Charging Rewards pilot²⁵ has been canceled with no replacement in sight.

Minnesota Power itself shares its only current EV residential managed charging offering is deterring customers due to its requirement to install a second meter. While its whole-home TOD rate offers one alternative to access off-peak charging rates for EVs without installing a second meter, it must be noted that a whole-home residential time-of-use program is materially different from one focused on providing off-peak charging rates for an EV only, as it requires a customer to consider how the electric load their entire home will interact with a time-of-use rate rather than only their EV. Additionally, the electricity rates offered in Residential Off-Peak EV tariff are lower for the off-peak portion, which is also longer, than what is offered on the Residential Time-of-Day rate.²⁶ The Residential Time-of-Day rate, on its own, is therefore insufficient to address the barrier of installing a second meter to access off-peak EV charging rates posed by Minnesota Power's Off-Peak Residential EV rate. Customers need additional options.

Finally, Minnesota Power is also providing rebates to customers to encourage the purchase of Level 2 Smart Chargers. Smart chargers could enable participation in a managed charging program similar to what Xcel Energy provides with its EV Accelerate at Home model.²⁷

For all these reasons, the CEGs strongly urge Minnesota Power to provide an additional EV residential managed charging program in or before its next TEP.

We also request Minnesota Power to comment on the availability of alternative technology providers in the market now that could offer a similar service to what the original technology provider planned to do in Minnesota Power's previous Charging Rewards Pilot.

b. Medium and Heavy Duty Vehicles

²⁵ The CEGs supported the Charging Rewards pilot as an innovative approach to incentivizing off-peak charging, in a manner not yet seen in Minnesota. See our [initial comments](#) filed September 22, 2020 in Docket No. E015/M-20-638 at 5.

²⁶ The Residential Off-Peak EV service tariff has an off-peak period from 10 pm to 8 am, with an electricity rate of 2.391 cents per kWh. The Residential TOD rate has a "super off-peak" period from 11 pm to 5 am at an electricity rate of 5.707 cents per kWh, and an "off-peak" period from 5 am to 3 pm at an electricity rate of 8.145 cents per kWh.

²⁷ Xcel Energy has offered EV Accelerate at Home since December 2020, which enables customers with an approved Level 2 charger to access off-peak charging for their EV, without need of a second meter.

Though Minnesota Power notes 15 customers are enrolled in its Commercial Electric Vehicle Charging rate, it does not provide an estimate of how many medium- or heavy-duty electric vehicles are currently based in its service territory. **The CEGs ask Minnesota Power to provide an estimate of how many medium and heavy-duty electric vehicles currently domicile in its service territory, as well as current or planned electric school buses.**

c. Proposed offerings

Minnesota Power outlines its plan to make its Commercial EV charging rate permanent, and its intention to file an EV charging program for multi-dwelling units by the fourth quarter of 2024.²⁸ The CEGs support both these efforts, and are especially eager to review what Minnesota Power proposes for its multi-dwelling unit offering later this year.

3) Gaps and additional programs for Minnesota Power to plan towards

As our introduction outlined, we are at a pivotal moment in our efforts to address climate change and meet our state and international greenhouse gas reduction goals. As such, continued innovation and additional planning is required to meet the climate challenge and build swiftly towards an electrified, equitable clean energy future.

Below the CEGs highlight areas that we hope to see more discussion of in Minnesota Power's next TEP. These recommendations align with what the Commission ordered Xcel Energy to include in its next TEP as part of its verbal order on Xcel Energy's TEP in the March 28 Agenda Meeting.

a. Additional discussion of how Minnesota Power is preparing for and supporting adoption of more heavy-duty electric vehicles, particularly transit buses, school buses, and trucks;

Heavy-duty vehicles are critical segments to electrify given the outsized per-vehicle and aggregate contributions of diesel trucks to greenhouse gas emissions and local air pollution.²⁹

Transit and school buses have been the "first movers" of heavy-duty vehicle electrification to-date in Minnesota, with several transit agencies (including Duluth Transit Agency, as Minnesota

²⁸ MP TEP at 8

²⁹ Union of Concerned Scientists, April 2022, "How to Eliminate Pollution from Heavy-Duty Vehicles".
<https://www.ucsusa.org/resources/heavy-duty-vehicles-and-nox>

Power notes) testing out electric buses and more school districts applying for or planning for electric school bus grants from the U.S. EPA Clean School Bus program or the Minnesota Pollution Control Agency's Volkswagen-funded program, and the to-be-launched Minnesota Department of Commerce's electric school bus grant program.

However, trucks are another part of the heavy-duty space that should be planned for, particularly given their outsized impact on local air pollution. Truck activity tends to be concentrated around freight centers and corridors where their tailpipe emissions harm the health of people in surrounding communities.³⁰ Zero-emission trucks cannot come soon enough for those communities. Electric trucks, in turn, can provide many of the same benefits as light-duty EVs for the grid and ratepayers through smart vehicle-grid integration.

To date, the only offering the Company has for heavy-duty vehicles is its Commercial EV Rate. That pilot, which Minnesota Power is seeking to make permanent, is a valuable first step to supporting the electrification of heavier vehicles. However, continued discussion of how utilities like Minnesota Power can support transit bus, school bus, and truck electrification is warranted, in order to continue to develop the overall market and support further adoption of these zero-emission technologies in Minnesota.

- b. A robust discussion of equity, including analysis on how Minnesota Power's electric vehicle programs are serving those disproportionately impacted by transportation pollution, as well as renters, multifamily housing residents, communities of color, "low to moderate" income customers, and rural communities; and what gaps may remain;

The CEGs have consistently advocated for utility EV planning to address equity and access in past comments on utilities' TEP,³¹ a priority that is shared by the Commission³² and was recently codified into Minnesota law. That statute states that a TEP may include "programs targeting transportation electrification in low- and moderate-income communities and in neighborhoods most affected by transportation-related air emissions" and that the Commission should consider whether a utility's TEP will "increase access to the use of electricity as a transportation fuel for all customers, including those in low- and moderate-income

³⁰ *Id.*

³¹ Clean Energy Groups, Initial Comments, *In the Matter of a Commission Inquiry into Electric Vehicle Charging and Infrastructure*, Docket No. E999/M-17-879 (September 30, 2020) at 3-5.

³² Commission Order Making Findings and Requiring Filings, Docket E.999/CI-17-879 (February 1, 2019) at 13. Order point 16.a and 16.b ask utilities to include a discussion of "a. environmental justice, with a focus on communities disproportionately disadvantaged by traditional fossil fuel use" and "b. Low-income access and equitable access to vehicles and charging infrastructure"

communities, rural communities, and communities most affected by air emissions from the transportation sector.”³³

The CEGs appreciate Minnesota Power’s ongoing efforts to increase access to EV charging across its service territory, such as the installation of 16 direct current fast charging station which will “provide access [to EV charging stations for] users in rural population centers”³⁴ and the Company’s intention to provide an EV charging program for multi-dwelling units later this year. As with Xcel Energy’s TEP, however, we think a dedicated discussion of how Minnesota Power is planning for equity and access throughout its EV programming is still worthwhile, and will help identify existing gaps in access that can spur additional EV program offerings in the future.

c. Discussion of coordination between electric vehicles, energy efficiency, and building electrification planning, including, for example, ECO programs.

As Minnesota gets further along the path of the clean energy transition, more integration and coordination across transportation electrification, building electrification, and energy efficiency will be needed. Electric utilities in particular play a vital role in ensuring this coordination happens. Inclusion of the TEP in the broader Integrated Distribution Plan is a first step. Another is ensuring that electric vehicle planning occurring under other program areas of Minnesota Power, are mentioned and linked to the TEP. In particular, the opportunity of fuel-switching incentives within the ECO program that support transportation electrification will be an area to track and discuss within TEPs as well, as Minnesota Power considers how and when to offer such incentives.

4) Conclusion

The CEGs thank the Commission for the opportunity to comment on Minnesota Power’s TEP. We look forward to continued work with the Commission, the Company, and other stakeholders to support the growth of EVs in Minnesota in a manner that lowers barriers to EV adoption for all customers, supports an innovative and sustainable EV marketplace, and maximizes the environmental and grid benefits of transportation electrification.

Sincerely,

³³ [Minn. Stat. §216B.1615, subd. 2.\(5\) and subd. 3\(2\)](#)

³⁴ MP IDP at 29

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CERTIFICATE OF SERVICE

I, Anjali Bains, hereby certify that I have this day, served a copy of the following document to the attached lists of persons by electronic filing and electronic mail.

Comments of Fresh Energy, Sierra Club, Union of Concerned Scientists, and Plug In America

Docket No. E002/M-23-258

Dated this 5th day of April 2024

/s/ Anjali Bains

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